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15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 FEDERAL TRADE COMMISSION,
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20 Plaintiff,

21 v.

22 AMG Services, Inc., et al.,

23 Defendants, and

24 Park 269 LLC, et al.,

25 Relief Defendants.
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Case No.: 2:12-cv-536-GMN-VCF

**AGREED JOINT MOTION TO STAY
PRELIMINARY INJUNCTION
BRIEFING AND ARGUMENT AND
PROPOSED ORDER**

1 Plaintiff Federal Trade Commission (“FTC”) and Defendants AMG Services, Inc.,
2 SFS, Inc., Red Cedar Services, Inc., MNE Services, Inc., Scott A. Tucker, Blaine A. Tucker,
3 AMG Capital Management, LLC, Level 5 Motorsports, LLC, LeadFlash Consulting, LLC,
4 Black Creek Capital Corporation, Broadmoor Capital Partners, LLC, Don E. Brady, Robert
5 D. Campbell, and Troy L. Littleaxe (collectively, “Defendants”) respectfully request that the
6 Court stay further briefing and argument regarding the FTC’s motion for preliminary
7 injunction (Docket No. 4.):

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9 1. The parties have reached agreement on a stipulated preliminary injunction and an
10 agreement to bifurcate this case into two phases: (1) merits/liability; and if necessary
11 (2) common enterprise liability, individual liability, and relief.

12 2. Both the stipulated preliminary injunction and bifurcation promote the orderly
13 resolution of controversy and judicial economy.

14 3. The parties’ proposed order for a stipulated preliminary injunction and bifurcation
15 of discovery has been submitted to United States District Judge Gloria M. Navarro for approval.

16 4. The parties agree that, pending Judge Navarro’s review of the parties’ proposed
17 order, further briefing and argument regarding the FTC’s motion for preliminary injunction
18 would waste the Court’s and the parties’ resources.

19 5. The parties agree that if their proposed order for a stipulated preliminary
20 injunction and bifurcation is not approved, they will, within seven days, meet and confer and
21 submit a proposal to the Court to reschedule the motion for preliminary injunction briefing and
22 argument.
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The parties therefore respectfully request that the Court stay all further briefing and argument regarding the FTC's motion for preliminary injunction (Docket No. 4).

Dated: December 7, 2012

/s/ Nikhil Singhvi

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IT IS SO ORDERED:



United States Magistrate Judge

DATED: 12-7-2012

CERTIFICATE OF SERVICE

I, Nikhil Singhvi, certify that, as indicated below, all parties were served with **AGREED JOINT MOTION TO STAY PRELIMINARY INJUNCTION BRIEFING AND ARGUMENT AND PROPOSED ORDER** filed with the Court.

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5 Dated this 7th day of December 2012.

/s/ Nikhil Singhvi

Nikhil Singhvi